

1 A. Yes. It's got two pieces, one goes on one
2 end, one goes on the other.

3 Q. The first thing you do before doing the
4 microscanning, you have to make sure the cable plant
5 is correct?

6 A. Yes.

7 Q. To make sure that's correct, essentially you
8 need to insure that the correct pieces of cable are
9 connected in a correct manner to the next piece of
10 cable --

11 A. Yes.

12 Q. -- so on and so forth?

13 A. Yes.

14 Q. Are there plans you follow with respect to
15 this?

16 A. Plans?

17 Q. Yes.

18 A. No, just the knowledge of the building and a
19 knowledge of cabling infrastructure, understanding the
20 pairing, understanding 568 B and 568 A configurations,
21 basically understanding pin outs and wiring.

22 Q. What are pin outs?

23 A. A pin out is a configuration of a cable to
24 work with a certain technology, so an Ethernet
25 connection has a certain pin out. A token ring

1 connection has a certain pin out. It's a wiring
2 schematic.

3 Q. Are there any books or manuals that explain
4 to you what the different pairings are or different
5 configurations are that you rely on at CTI?

6 MS. PONTOSKI: Objection to the form
7 of the question.

8 A. That we rely on, we have configurations in
9 our manual, but it is a requirement to understand the
10 wiring specifications and pin configurations as part
11 of being a technician.

12 Q. So if you are hired as a technician, it would
13 be expected you would already know what the wiring
14 configurations are?

15 A. Yes.

16 Q. I am going to get back to some of this, but I
17 want to move on to when you started to work with Mr.
18 Millan.

19 (Brief recess was had.)

20 Q. At some point Mr. Millan reported directly to
21 you?

22 A. Yes.

23 Q. When was that?

24 A. I believe it was 2001 through 2003.

25 Q. When he started to report to you, was he a

1 new employee, or had he already been working in the
2 department?

3 A. No, he had already been working.

4 Q. How did it come about that he started to
5 report to you?

6 A. I don't remember. I know he was in another
7 group under our department and came over to my area.

8 Q. What area was yours at that time?

9 A. Infrastructure.

10 Q. Do you know what department he moved from?

11 A. Infrastructure as well.

12 Q. But you said he was in another group.

13 Did it have a separate title?

14 A. Separate infrastructure group.

15 Q. Did each of those two infrastructure groups
16 have different titles?

17 A. No.

18 Q. Any reason why they were separate groups?

19 A. They supported separate buildings, both
20 reported to the same manager.

21 Q. Which building -- which buildings, if you
22 know, did his prior group support?

23 A. 390 Greenwich Street and 125 Broad Street
24 were two of the sites he worked.

25 Q. The five sites you listed earlier, or at

1 least the three sites, one with the three data
2 centers, were they the sites your group covered at
3 that time when you moved over, or were they different
4 sites?

5 MS. PONTOSKI: Objection to the form
6 of the question.

7 BY MS. PONTOSKI:

8 Q. Do you understand, or do you want me to ask
9 it a better way?

10 A. Yes, please ask again.

11 Q. At the time Mr. Millan moved to your group,
12 which buildings were your group services?

13 A. The sites that I gave you earlier, 388
14 Greenwich Street -- and I don't remember.

15 What did I give you earlier?

16 Q. You gave me 390 Greenwich Street, you said
17 there were three data centers, 333 West 34th and Two
18 Journal Square Plaza.

19 A. On top of those I had 388 Greenwich Street,
20 New York Stock Exchange, American Stock Exchange and
21 14 Wall Street.

22 Q. In addition to the ones you listed earlier?

23 A. Yes. I want to make a note, 390 Greenwich
24 Street was supported by the other manager. But 390
25 Greenwich Street also had data centers for trading,

1 and they had the whole user environment, which was
2 supported by another manager.

3 The only thing we supported at 390
4 was the eighth floor, the three data centers on the
5 eighth floor at the time.

6 A. It was two different groups and totally
7 separate, even though it was -- we shared the same
8 building pretty much, some support.

9 Q. The group you were working for at the time
10 Mr. Millan started to work for you, who was your
11 immediate boss?

12 A. Garfield Spence.

13 Q. Who was the head of that group?

14 A. Garfield Spence.

15 Q. How many team -- was he -- what was his
16 title?

17 A. Vice president, I believe.

18 Q. Aside from being a vice president, did he
19 have another title?

20 A. I don't know.

21 Q. Like project manager, something like that?

22 A. I don't know.

23 Q. At the time, were you a team leader or
24 something else?

25 A. Team leader.

1 Q. How many team leaders were reporting to
2 Garfield Spence?

3 A. Three, I believe.

4 Q. Including yourself?

5 A. Yes.

6 Q. Who were the other two?

7 A. Rick Braunagel, and I believe Pat Foster.

8 Q. Did you have interaction with Mr. Millan
9 before he moved over to your group?

10 A. No.

11 Q. So that was the first time you met him?

12 A. Yes.

13 Q. How many people were reporting to you at the
14 time?

15 A. Same as I gave you before, when I was a team
16 lead, five or six.

17 Q. What were the titles of those people when
18 they reported to you?

19 A. I don't recall.

20 Q. What did you refer to them as?

21 A. Techs.

22 Q. At the time Carmelo Millan transferred to
23 your group, what were his duties and responsibilities
24 at the very beginning when he started to report to
25 you?

1 A. At the very beginning, he was a technician.

2 Q. What were his duties and responsibilities as
3 a technician?

4 A. Same as I listed earlier.

5 Q. Could you go over them for me again, as you
6 listed with respect to what --

7 A. All the duties --

8 Q. -- that you had?

9 A. -- my group performed.

10 Q. Specifically I wanted to go over the duties
11 and responsibilities that he had as opposed to the
12 group that he had.

13 A. When you asked before I became a team lead
14 and what my duties were, it's those same duties.

15 Q. What about the rest of the technicians, they
16 all had the same duties?

17 A. Yes.

18 Q. Not just for your group --

19 A. I really can't speak for them, because I
20 don't know how they operated.

21 Q. How was work assigned to your specific group?

22 A. Work would be filtered down through me.

23 Q. Where did you -- who assigned work to you?

24 A. Project managers, engineers, integration,
25 system administrators.

1 Q. How many, back at that time when Mr. Millan
2 started reporting to you, how many devices was your
3 group servicing?

4 MS. PONTOSKI: Objection to the form
5 of the question.

6 A. Over 20,000, I would think.

7 Q. Was there a specific building you did more
8 work with than any other specific location?

9 A. 388 Greenwich Street.

10 Q. Any reason?

11 A. Because of its size, 39 floors.

12 Q. You said you would have work assigned by
13 project managers, engineers, integration.

14 I am assuming you mean the
15 integration department?

16 A. Network integration.

17 Q. Network integration and system
18 administrators?

19 A. (Witness nods head.)

20 Q. How was the work assigned to you, was there a
21 system through which the work was assigned?

22 A. It would be comtrack was the system we would
23 get requests, TAS, technology asset system, for server
24 installations in the data center, e-mails for network
25 requests, GPMS for problem management.

1 Q. So was comtrack a system that was in place at
2 the time when Mr. Millan first started to report to
3 you?

4 A. Yes.

5 Q. Explain to me how comtrack worked.

6 A. It's a system that generates MAC requests for
7 moves, adds, changes. I was the team leader.
8 Requests would come in to me, and I would filter them
9 down to the team.

10 Q. How would a request come to you, like a
11 physical piece of paper, e-mail?

12 A. It's a virtual system, with a ticket number,
13 assignment group name, and it went to the team lead
14 for review and re-assignment.

15 Q. Through comtrack, who determined it went to
16 you, was it an automatic system?

17 A. Project management.

18 Q. When you refer to project management, what is
19 project management?

20 A. Project management office that coordinated
21 MAC's with businesses.

22 Q. That was a separate department?

23 A. Project management office, yes.

24 Q. We talked about MAC's earlier, the M stands
25 for move?

- 1 A. (Witness nods head.)
- 2 Q. So that would be what we were talking about
- 3 if 25 are moving from one floor to another?
- 4 A. 25, 50, 100, 300.
- 5 Q. Adds would be if you were adding more people
- 6 to a --
- 7 A. Adding a work station, new hire.
- 8 Q. That could be one person?
- 9 A. Printer.
- 10 Q. One person or one new device?
- 11 A. Add a phone, it can be anything.
- 12 Q. The C is a change. Tell me what -- how that
- 13 is different to the other two?
- 14 A. It's pretty much one in the same. It's
- 15 called a MAC, moves, adds, changes.
- 16 Q. So a change might be taking out one printer
- 17 and putting in a new one?
- 18 A. Yes.
- 19 Q. Instead of adding you are kind of --
- 20 A. Yes.
- 21 Q. -- replacing?
- 22 A. Changing, replacing.
- 23 Q. The comtrack system, it would issue a ticket
- 24 number --
- 25 A. Yes.

1 Q. -- for a specific job?

2 A. Yes.

3 Q. That just was responsible for generating the
4 MAC's?

5 A. Yes.

6 Q. And back again at the time when Mr. Millan
7 started to report to you, can you estimate on a weekly
8 basis how many ticket requests you would receive?

9 A. Weekly, I don't know, maybe a hundred to 150.
10 I don't remember.

11 Q. Presumably a move would be the most
12 significant in terms of actual work that had to be
13 done?

14 A. Actually, it would be in the data center,
15 data center was the toughest portion of work that we
16 handled.

17 Q. Explain to me what you did in the data center
18 and why it was the toughest portion of work.

19 A. Data center was a -- is a place where we use
20 the TAS system, technology asset system, for server
21 installations. Server installations involve
22 coordination with system administrators, get the
23 equipment from them, work with the engineering folks
24 on proper placement within the data center. There
25 would be QA with that, depending on the network

1 segments required for that server.

2 Q. Tell me what QA is, is it questions and
3 answers?

4 A. QA is reviewing what an engineer is giving
5 you. If an engineer tells you, you will put this box
6 in this cabinet and the network that's requested is in
7 a cabinet on the other side, you have to go back to
8 the engineer and say, you need to give me a cabinet in
9 this area, because the network segment is in this
10 room, not in this room.

11 Determining the cable system is too
12 great to go from one cabinet to where the network
13 switch is, submittal of network changes to insure the
14 ports are configured as per request.

15 Q. The TAS system is separate to the comtrack
16 system?

17 A. Yes.

18 Q. What I wanted to know, we will get back to
19 the TAS system, through the comtrack system of the
20 moves, adds or changes, move would be the most
21 significant of those three?

22 A. Yes.

23 Q. You just testified that aside from that
24 comtrack system, the TAS system was more significant
25 work or greater work --

1 A. Yes.

2 Q. -- than what came through comtrack?

3 A. Yes.

4 Q. On a weekly basis, if you could break down
5 for your group, if you could give me an estimation of
6 percentage of time spent on TAS projects as compared
7 to comtrack projects as compared to GPMS projects as
8 compared to e-mails for network requests, those four
9 different things you testified where you got work
10 from; could you break down by percentage which was the
11 most significant?

12 MS. PONTOSKI: Objection to form of
13 the question.

14 A. Very hard to determine. I don't know, it's
15 very hard to determine that. The data center had
16 multiple requests weekly as well.

17 Q. Could you give me an average on a weekly
18 basis, I know you said 150 from comtrack?

19 A. Anywhere between 25 and 60 installs a week.
20 And coordinating a service install is a lot more
21 cumbersome than coordinating a move because of the
22 multiple departments that you need to work with.

23 You need to work with the
24 administrators to insure they deliver the equipment to
25 you properly, that they provide the necessary network

1 information in the TAS system, and you need to work
2 with the engineering folks to insure that you have the
3 proper space.

4 You also need to work with critical
5 systems to insure that there's proper power and
6 cooling; that you are not exceeding any air
7 limitations or any power limitations.

8 Q. Critical systems is --

9 A. Power and cooling.

10 Q. How would you work with critical systems in
11 doing that?

12 A. If you get a request from an engineer that
13 says put it in this cabinet, and you already have
14 three or four devices in that cabinet, at times you
15 need to check with critical systems to insure you can
16 put a new box in there so that you don't blow a
17 cabinet or, you know, hurt the cooling in the area.

18 Q. So you would call somebody in critical
19 systems or communicate somehow?

20 A. Communicate by e-mail, whatever would work
21 with the critical systems folks.

22 Q. You would tell them there are X number of
23 unit or devices in this cabinet and we want to put in
24 another one, is that okay?

25 A. Yes.

1 Q. They would tell you whether --

2 A. Yes.

3 Q. -- whether it would work or not?

4 A. Yes.

5 Q. You said 25 to 60 server install requests for
6 the data center a week. That's just through the TAS
7 system?

8 A. Yes.

9 Q. In terms of e-mails for network requests,
10 again, if you can give me an estimate per week as to
11 how many of those you would get?

12 A. It would depend on the time frame. If we
13 were upgrading a building where we were physically
14 taking the equipment out of a communication room and
15 putting in new equipment, I mean, to do forty floors
16 is a huge project, and you would be, you know, doing
17 several installs a week.

18 Q. Between 2001 and 2003, how many building
19 moves like that would you say occurred?

20 A. I don't know. But we did a lot of upgrades
21 to newer versions of Sisco chassis which involved lots
22 of weekend cut-overs, no down times allowed to the
23 businesses, so we would have to cut over after hours.

24 A lot of preparation work, creating
25 new databases for old or new devices going in and a

1 lot of physical installations.

2 Q. If a building move or something similar in
3 terms of it going a big project was not going on,
4 typically how many e-mails would you get for network
5 requests in a week?

6 A. I don't know.

7 Q. Would it be more than a hundred?

8 A. No.

9 Q. More than fifty?

10 A. I don't know.

11 Q. That's fine. If you don't know, that's fine.

12 I am trying to see if we can narrow it down.

13 A. It varies.

14 Q. I know you said through the comtrack system a
15 ticket is generated with a number.

16 So presumably there's a tracking
17 mechanism whereby you can go into comtrack and check
18 to see how many tickets have been issued to your team?

19 MS. BOUCHARD: Objection to the
20 form.

21 A. You can't anymore, because comtrack has been
22 dissolved, doesn't exist anymore.

23 Q. When was it dissolved?

24 A. Two to three years ago.

25 Q. Up to that time you could check with comtrack

1 to see how many tickets were issued?

2 A. Yes.

3 Q. Through the TAS system was there a similar
4 ticketing system with a number?

5 A. Yes.

6 Q. So there was a ticket issued with a number?

7 A. Yes.

8 Q. Is the TAS system still in place?

9 A. Yes, it is.

10 Q. So there would be a way to check to see how
11 many TAS tickets were issued during a certain period
12 of time?

13 MS. BOUCHARD: Objection to the form
14 of the question.

15 A. I don't know.

16 Q. Did you make any efforts to find out if that
17 could be done?

18 A. No.

19 Q. If an e-mail was sent for a network request,
20 would a ticket or something similar have to be created
21 with respect to that specific request?

22 A. Ultimately a network change would have to be
23 submitted.

24 Q. Is that something different than a ticket
25 with a number on it?

1 A. It would be a virtual change, which is what
2 it is called now. Back then it was called info man.

3 Q. Info man?

4 A. Yes. And that would be the change system,
5 the change management system we used for any network
6 changes to the environment.

7 Q. Is that not in place anymore, the info man?

8 A. Yes, it is. It's now called virtual change.

9 Q. Is there a way to check through virtual
10 change how many network requests would be processed?

11 MS. PONTOSKI: Objection to the form
12 of the question.

13 A. I don't know.

14 Q. Did you make any efforts to find that out?

15 A. No.

16 Q. The GPMS system, could you tell me again what
17 that stands for?

18 A. Global problem management system, I believe.

19 Q. Would a similar ticket be issued when a
20 request came through the GPMS system?

21 A. Yes.

22 Q. With a number attached to it?

23 A. Yes.

24 Q. Is the GPMS system still in place?

25 A. No.

THOMAS SARANELLO

Page 61

1 Q. When was that -- at what point was that
2 discontinued?

3 A. Same time as comtrack, roughly two years ago,
4 I believe, two or three years ago.

5 Q. Was it replaced with another system?

6 A. Virtual tech. And so was comtrack, virtual
7 tech.

8 Q. That's different to the system that took over
9 from the info man?

10 A. Yes.

11 Q. That was again virtual --

12 A. Info man replaced -- sorry, virtual change
13 replaced info man.

14 Q. Virtual tech replaced comtrack and GPMS?

15 A. Yes. But the comtrack portion is called
16 virtual request, but it's in the same system with a
17 separate tab.

18 (Discussion off the record.)

19 Q. Could you give me an estimation how many work
20 requests would come through the GPMS system back at
21 the time that Carmelo Millan first started to report
22 to you on a weekly basis?

23 A. Between five and fifteen maybe.

24 Q. Were the work requests generated through the
25 GPMS system more complicated or time consuming than

1 the comtrack requests or less?

2 MS. PONTOSKI: Objection to the form
3 of the question.

4 A. Depends, GPMS is a trouble system.

5 Q. So it could be significant or something
6 minor?

7 A. Yes.

8 Q. You have explained to me the type of requests
9 that would come through TAS. Let's go through in a
10 little more detail the type of requests that would
11 come through comtrack.

12 Could you tell me?

13 A. Moves as in changes pretty much.

14 Q. That's it, through comtrack?

15 A. Comtrack is moves, adds and changes, at times
16 for a server install. Even though the request was
17 submitted through TAS, a comtrack request would also
18 be submitted for a purchase of it, because comtrack
19 not only was the MAC system but it was also used for
20 purchasing at the time.

21 So sometimes we would automatically
22 be tasked to a comtrack purchase.

23 Q. When you say tasked to a comtrack purchase,
24 what does that mean, assigned to it?

25 A. Yes.

1 Q. So you would be assigned to make that
2 purchase?

3 A. No. We would be assigned as a service
4 provider under that request.

5 Q. Did you have to do anything in connection
6 with that or --

7 A. We were doing the work in TAS, so we would
8 close our task and say refer to TAS number. We did
9 what we had to do. Very confusing, because again,
10 comtrack was used for MAC's, but it was also used for
11 purchases.

12 So on a MAC for a new hire PC, you
13 would see the purchase on there for the PC, and then
14 you would see the service providers underneath it.
15 You would have the network, the data people, the voice
16 people, phone people.

17 Q. You said through the TAS system, for the data
18 center you would get approximately 25 to 60 service
19 install requests per week?

20 A. Roughly.

21 Q. Now, I want you to go through for me what a
22 server install request is.

23 A. I did earlier.

24 Q. Is that what you -- that's what I was going
25 to ask, is that what you explained earlier --

1 A. Yes.

2 Q. -- when talking about the TAS system?

3 A. Working with engineering and critical systems
4 and system administrators, yes, that's a server
5 installation.

6 Q. What would be the first thing you would have
7 to do with respect to a server install?

8 A. QA the space portion, where it's going.

9 Q. When you say QA the space portion, what would
10 you specifically have to do with respect to working
11 out where it was going?

12 A. The steps I reviewed earlier; working with
13 critical systems, working with network engineering to
14 QA where they put it on the diagram.

15 MS. BOUCHARD: Does everyone know
16 for the record what QA is?

17 MS. WALSH: I asked him.

18 Q. You referred to a diagram. Who generated a
19 diagram and what did the diagram consist of?

20 A. Network engineering generated an acrobat PDF
21 file for us, which shows the cabinet layout and the
22 placement of the server.

23 Being we had multiple data centers
24 on the same floor, depending on the segment requested,
25 engineering may have placed it in the wrong room,

1 wrong cabinet, wrong area. And that, in turn, is why
2 we QA the engineering portion of a server
3 installation.

4 Q. So you take the diagram you get from network
5 engineering, and you do what you say QA.

6 What does that actually involve?

7 A. Visiting the cabinet, understanding where
8 your network is, where the physical Sisco switches are
9 that house the network that the system administrator
10 is requesting, and insuring that it does not exceed
11 the Ethernet distance limitations.

12 Just because an engineer says it
13 goes in this cabinet doesn't mean it goes in that
14 cabinet because; A, it can either exceed the cooling
15 and power requirements of that cabinet; or B, not be
16 near the network segment that is requested; C, exceed
17 the cable distance limitations.

18 Q. They are the three things you could have a
19 problem with?

20 A. Yes.

21 Q. We talked about exceeding the cooling and
22 heating requirements not near the network segment.

23 What was the network segment?

24 A. Sisco switches that house the actual network
25 that those servers are going to be plugged into.

1 Q. Not physically near it?

2 A. Not physically close enough.

3 Q. Was there a requirement it be a certain
4 distance?

5 A. 330 feet is the Ethernet distance limitation.

6 As I said earlier, we had three data centers on the
7 same floor, pretty big area, and if we were told to
8 put something in one room and the subnet segment was
9 in another room, it doesn't work.

10 Q. Why not?

11 A. Because of the distance, it exceeds the
12 distance limitations.

13 Q. It exceeds the 350 feet --

14 A. 330.

15 Q. 330 feet limitation. Okay.

16 Is that actually, say, as the crow
17 flies, or is that cable distance, the length of cable?

18 A. It is the cable distance and the network
19 dependency. The network will be latent. It won't
20 properly function if you exceed those distance
21 limitations.

22 Q. I am trying to figure out, when you are
23 determining the 330 feet, is it a straight measurement
24 in terms of as the crow flies, or is it a measurement
25 as it goes through cables, turns, and bends?

1 A. It's a measurement with a cable tester,
2 microtest. Once you install your interconnects
3 between that switch that's connected and the server
4 cabinet, that's where you determine your distance.

5 Q. So the microscanner tells you the distance?

6 A. Yes. End to end.

7 Q. You don't go out and measure it?

8 A. With a stick, no. You install your
9 interconnects from your switch to your server. Then
10 the cable hangs on either side; you put one end of
11 your tester on one end, the smart end on the other
12 end, and you run your cable test to insure they pass.

13 Q. Do you have to set the microscanner?

14 A. Yes.

15 Q. Is there a setting mechanism?

16 A. Yes.

17 Q. How do you do that?

18 A. Through menus on the tester.

19 Q. What types of information go into determining
20 how you set it?

21 A. Distance parameters, capacity, loop
22 resistance, impedance.

23 Q. Go through those a little slower. Start
24 again, distance parameters?

25 A. Distance parameters, capacity, loop

1 resistance, near and cross talk.

2 Q. Near and cross talk?

3 A. Yes.

4 Q. Anything else?

5 A. There are a few more, but these are the
6 critical ones, these are the ones we pay attention to.
7 Near and cross talk is how pairs interfere with each
8 other electrically.

9 Q. Pairs of what?

10 A. Of wire. So if our cables, which are four
11 pair cables, eight wire cables, the pairs that are
12 twisted cannot interfere with the other pairs. As you
13 exceed distances, they tend to interfere and you get
14 failures.

15 Q. Capacity, you are talking about port
16 capacity?

17 A. No.

18 Q. What capacity?

19 A. Capacity -- I don't know the definition of
20 capacity, but it's another parameter that's tested on
21 cabling. I don't know if it's the ohms -- no, the
22 impedance is the ohms of the cable to insure it's a
23 hundred ohm or 75 ohm.

24 Capacitance is a test that pretty
25 much tests the tunnel from end to end to make sure

1 that you have the capacitance for that signal to pass
2 through. That's my definition of capacitance. I
3 don't know the exact way to define it.

4 Q. Distance parameters, is that what we already
5 discussed?

6 A. The 330 feet.

7 Q. Did you have a system whereby you assigned
8 work to the five to six people that reported to you?

9 A. Yes, I used every system that we had to
10 re-assign a MAC, basically put the MAC under the
11 technician's name, send them an e-mail to let them
12 know that this ticket has been placed under your name,
13 please proceed.

14 Q. Did you always re-assign the tasks, or did
15 you do any of them yourself?

16 A. I did some myself as well, but I did
17 re-assign most of them.

18 Q. Any particular reason you would keep specific
19 tasks to do yourself?

20 A. No, just to help with the workload.

21 Q. It wasn't that you kept more difficult ones
22 and assigned easier ones?

23 A. No.

24 Q. So if they were particularly busy, you might
25 chip in?

1 A. Yes.

2 Q. You referred earlier to the fact that at some
3 point you went through a particularly busy period
4 where you were required to -- I can't remember the
5 term you used, I think it was --

6 A. Sisco --

7 Q. Cut-overs, weekend cut-overs?

8 A. Yes.

9 Q. What is a weekend cut-over, explain that term
10 to me?

11 A. It is a -- pretty much you are going into a
12 tech room and you are taking out the old switch, Sisco
13 switch, and you are putting in a new one.

14 Q. That's what a cut-over is?

15 A. Yes. That's one cut-over, one form of a
16 cut-over.

17 Q. There are different forms of cut-over?

18 A. It could be a move cut-over. Move cut-over
19 could be moving fifty people overnight.

20 Q. I am trying to figure out what a cut-over
21 specifically is.

22 Is it that you are working outside
23 of regular hours?

24 A. At times, yes.

25 Q. That's not what a cut-over means.

1 A. A cut-over means you are either cutting over
2 that switch to a new switch, new technology, or you
3 are moving people at a certain time. That's when the
4 cut-over is happening. The cut-over for these fifty
5 people is 3 p.m. this afternoon, that's the cut-over.

6 Q. It's essentially the time at which the change
7 is happening or the move is happening?

8 A. Yes.

9 Q. You said you were doing a lot of weekend --
10 at one point you were doing a lot of weekend
11 cut-overs?

12 A. For the Sisco upgrade. I believe it was
13 prior to 2001.

14 Q. Was it when Mr. Millan was reporting to you?

15 A. No.

16 Q. It was prior to that?

17 A. Yes.

18 Q. When Mr. Millan was reporting to you, did he
19 ever have to come in on weekends?

20 A. I don't recall.

21 Q. If you wanted to find that information out,
22 is there a way you could do it?

23 A. Me, physically, no.

24 Q. Is there somebody you could request that
25 information from?

1 A. Not that I know of. The time system is not
2 being used anymore from when Carmelo was here.

3 Q. Did you make any efforts to find out if you
4 could determine whether he came in on weekends?

5 A. No.

6 Q. Did you make any effort to find out what his
7 time was when he reported to you?

8 A. No.

9 Q. The time system you referred to that is no
10 longer in use, is there a title for that time system
11 or a name for that time system?

12 A. Time reporting system.

13 Q. Was the time reporting system in use the
14 entire time Mr. Millan reported to you?

15 A. Yes. Let me rephrase that. I don't know if
16 it was the entire time.

17 At some point I believe he was using
18 TRS?

19 MS. BOUCHARD: This exceeds the
20 scope to the extent he's not the custodian of TRS.

21 THE WITNESS: No, I am not.

22 Q. To your recollection, Mr. Millan did come in
23 occasionally on weekends when he reported to you?

24 MS. BOUCHARD: Excuse me.

25 A. I cannot confirm.

1 Q. You don't recall?

2 A. I don't recall. I don't keep tabs on ...

3 Q. Was there a time technicians were coming in
4 on weekends and getting paid a stipend for doing that?

5 A. I don't know.

6 Q. Did you, as a technician, ever get paid a
7 stipend for coming in on weekends?

8 A. What is a stipend?

9 Q. Extra sum of money for coming in on the
10 weekend.

11 A. Yes, there was a time.

12 Q. When was that?

13 A. I don't recall. It's been several years.

14 Q. Was it prior to September 11th?

15 A. Yes.

16 Q. For the record, when I say September 11th, I
17 am referring to September 11th, 2001.

18 What was the system by which money
19 was paid if you came in over the weekend?

20 A. I believe it was eighty dollars for five
21 hours worked on a Saturday or Sunday. It's been a
22 long time since we had that in place.

23 Q. Did you get money to buy lunch or food as
24 well?

25 A. Yes. It was an extra ten dollars, I believe.

1 I don't know if it was seventy plus the ten or seventy
2 for the five hours and then ten, something like that.

3 Q. Was that when you were team leader or
4 technician?

5 A. Technician.

6 Q. Did you yourself come in on weekends and get
7 paid that money on occasion?

8 A. Yes.

9 Q. How often did you do that when you were a
10 technician?

11 A. I don't know.

12 Q. Could you give me an estimate on a yearly
13 basis how often you did that?

14 A. I don't recall.

15 Q. Would it be more than one weekend a year?

16 A. I would say three or four. I don't recall.

17 Q. Was that for a specific reason, would it have
18 been for a specific project going on?

19 A. Yes.

20 MS. BOUCHARD: Again, these
21 questions relating to the time he worked is outside
22 the scope of the 30(b)6 deposition. I don't mind if
23 you ask him the questions in his individual capacity.

24 MS. WALSH: That's fine.

25 Q. Now, you said at some point they did away

1 with paying technicians this extra money on the
2 weekend to come in and do work.

3 Do you recall if there was a
4 specific reason for that?

5 A. No.

6 Q. Did anybody ever communicate there was a
7 reason for that?

8 A. Not that I remember, no.

9 Q. After that was done away with, would you
10 still continue to come in on weekends occasionally?

11 A. Yes.

12 Q. And you just weren't paid for it?

13 A. No.

14 Q. When Mr. Millan reported to you, was there a
15 specific task that -- withdrawn.

16 You told me about the system you
17 went through to assign tasks to the technicians that
18 reported to you.

19 Did you take into consideration
20 which technician you were assigning which project to?

21 A. Yes.

22 Q. How did you determine that?

23 A. Knowledge base, speed.

24 Q. Anything else?

25 A. Accuracy.

1 Q. Anything else?

2 A. Not that I can think of.

3 Q. At the time Mr. Millan started reporting to
4 you, who were the other technicians reporting to you?

5 A. John Walter, William O'Donnell, John
6 Franzitta, Chris Depinto, and Brian Haughton,
7 H-A-U-G-H-T-O-N.

8 Q. Did that change over the course of time that
9 Mr. Millan reported to you?

10 A. I don't recall. Employees come, leave, I
11 don't know.

12 Q. When Mr. Millan first came from the other
13 group to report to you, did you make a determination
14 with respect to his experience?

15 A. Could you rephrase that?

16 Q. Did you form an opinion, after Mr. Millan
17 came to work for your group, how he compared with the
18 other technicians in your group in terms of knowledge
19 and experience?

20 A. Right away.

21 Q. At some point did you make that
22 determination?

23 A. During his year end review.

24 Q. What was the determination?

25 A. Well-rounded, knowledgeable.

- 1 Q. Was he accurate?
- 2 A. Network savvy. Accurate.
- 3 Q. Was he quick at completing projects?
- 4 A. Yes.
- 5 Q. Do you know who Rich Braunagel?
- 6 A. Braunagel.
- 7 Q. Who is Rich Braunagel?
- 8 A. Carmelo's team leader before me.
- 9 Q. Do you know him personally?
- 10 A. Just through work.
- 11 Q. Is he still working for CTI?
- 12 A. Yes.
- 13 Q. Just to go back to the people you listed.
- 14 John Walter, is he still working for
- 15 CTI?
- 16 A. Yes.
- 17 Q. William O'Donnell?
- 18 A. Yes.
- 19 Q. John Franzitta?
- 20 A. Yes.
- 21 Q. He's still working for CTI?
- 22 A. (Witness nods head.)
- 23 Q. Chris Depinto?
- 24 A. Yes.
- 25 Q. Brian Haughton?

1 A. Yes.

2 (Saranello Deposition Exhibit Number
3 1 was marked for identification.)

4 Q. Let me know when you had a chance to review
5 it.

6 You are done?

7 A. Yes.

8 Q. Do you recognize this document?

9 A. Yes.

10 Q. Could you tell me what it is?

11 A. 2001 year end performance review.

12 Q. For Mr. Millan?

13 A. Yes.

14 Q. And under reviewer name it says Richard
15 Braunagel.

16 Mr. Braunagel was Mr. Millan's
17 supervisor in December of 2001, is that correct?

18 A. Yes.

19 Q. If you could turn to page two of the
20 document, at the bottom of it, under overall
21 performance summary, do you see that?

22 A. Yes.

23 Q. It says, I believe that his being a part of
24 the infrastructure group is not utilizing his
25 experience yet most of his abilities, I believe that

1 Carmelo may not feel challenged by the work within the
2 infrastructure structure group. I find relocating him
3 to another group, whether it be integration or systems
4 admin, may be a little more beneficial to his needs.

5 Do you know if that was the time
6 when he was transferred to your group?

7 A. Yes.

8 Q. And was that considered a lateral move or
9 promotion?

10 A. Lateral move.

11 Q. Was the work in your group more challenging
12 than the work in Mr. Braunagel's group?

13 A. Pretty much the same.

14 Q. So the technicians who worked in Mr.
15 Braunagel's group were pretty much doing the same work
16 as the technicians working in your group?

17 A. Pretty much, yes.

18 MS. BOUCHARD: When you say
19 technicians, you mean including Mr. Millan?

20 MS. WALSH: Yes.

21 A. Yes.

22 Q. Again, if you go back to the first page of
23 the report under key job responsibilities, the third
24 one there is provide neat and accurate cabling
25 documentation.

1 How would a technician -- at the
2 time, how did a technician provide cabling
3 documentation?

4 A. When you install conductivity, you need to
5 follow up and document it and put it into a shared
6 database.

7 Q. How do you do that?

8 A. Open up the file and put your information
9 across.

10 Q. So you physically type in the information?

11 A. Yes.

12 Q. Into something like an Excel spreadsheet?

13 A. Excel or Access.

14 Q. What information are you actually putting in
15 there?

16 A. Depending if it's a server installation, you
17 are putting in all the interconnects that are from the
18 switch back to the server. If it's a desktop
19 installation, you are putting your interconnects from
20 the desktop to the switch.

21 When you are installing fiberoptic
22 interconnects, same concept, putting your interconnect
23 information. When you are installing T 1 circuits,
24 ISDN circuits, POTS circuits, you are entering the
25 cable path.

1 Q. What is the interconnect information?

2 A. Cross connect database, cable path from one
3 point to another point.

4 Q. Is it a number, something else, how do you
5 track what the -- what are you actually typing in when
6 you put in the interconnect information?

7 A. Panel number with the port number.

8 Q. Where do you get that from?

9 A. From the tech room that it's in.

10 Q. So in the tech room, are you looking at the
11 specific device; what are you looking at to get this
12 information?

13 A. Patch panel, switch port.

14 Q. It's usually a series of numbers, letters
15 maybe?

16 A. Yes.

17 Q. The purpose of that is what?

18 A. To insure your environment is documented.

19 Q. Why is that?

20 A. For trouble shooting purposes, just overall
21 best practices to keep documentation of your
22 infrastructure.

23 Q. With respect to T 1 lines, what did you say
24 was the information you had to put in?

25 A. Same, depending on where you -- where a T 1

1 is coming from would be a circuit coming from the
2 street, and you would have to document that
3 information from where it comes in from the street all
4 the way across to its end point.

5 Q. Is that inputting numbers from specific
6 devices?

7 A. Yes.

8 Q. The second item listed under key job
9 responsibilities, network engineering slash
10 integration deliverables to include all network
11 related projects, do you see where that is?

12 A. Yes.

13 Q. Can you explain what that is, what that
14 means?

15 A. Basically what I explained earlier; our
16 interaction with network integration and network
17 engineering, working closely with that team to insure
18 projects are carried out properly.

19 Q. I know we went over in detail the interaction
20 with network engineering.

21 How is that different with the
22 network integration?

23 A. Network integration is the team between us
24 and engineering. Integration pretty much does the
25 ordering of the equipment. They, along with us, QA

1 configurations that engineering is passing down to
2 them for new build-outs.

3 We work together, all three of us,
4 all three groups, to carry out projects.

5 Q. Does your group, if there's a new floor being
6 installed, does your group physically install the
7 devices or does somebody else do that?

8 A. We install the devices.

9 Q. So if there's a CPU, printer --

10 A. No. Network related.

11 Q. Only network related devices?

12 A. Yes. Printers are done by system
13 administrators.

14 Q. List for me the network devices you
15 physically install.

16 A. Yes.

17 Q. Can you name them?

18 A. Cisco, Adtran CSU's, multiple type of Cisco
19 devices. I can't name them all, but mostly they are
20 Cisco routers and switches.

21 Q. Could you break it down even more beyond
22 identifying the brand name? You say routers and
23 switchers -- switch switches, sorry.

24 A. Yes.

25 Q. What else? Cables presumably?

1 A. Probes, cabling, servers. That's all I can
2 think of.

3 Q. The integration department actually orders
4 the equipment?

5 A. Yes, and they work on implementing the
6 network portion of the project.

7 Q. What does that mean?

8 A. That means if multiple switches or a switch
9 goes on line, the network integration team would be
10 involved in submitting a network change to get that
11 switch or router into production. And we would work
12 hand in hand with them on it.

13 Q. What would be your input into that?

14 A. Same QA. We would focus on the cabling
15 aspect and the configurations at the port level we are
16 going to need for our clients.

17 And the network teams would focus on
18 the overall basic configuration of the device and the
19 network change coordination.

20 MS. WALSH: Let's take a break.

21 (Lunch recess was had.)

22 Q. Mr. Saranello, before the break, you gave me
23 the names of the other technicians who worked at the
24 same time -- who reported to you at the same time as
25 Mr. Millan.